at&t

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June 17, 2010

The Honorable Jocelyn Boyd
Interim Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

   Re: Docket No. 2001-209-C - Application of BellSouth Telecommunications, Inc. to Provide in-Region InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996

Dear Ms. Boyd:

   AT&T has recently implemented certain system changes in the Southeast region. Specifically, AT&T retired the Electronic Data Interchange ("EDI") and the Telecommunications Access Gateway/Direct Extensible Markup Language ("TAG/XML") interfaces for pre-order transaction and submission of new Local Service Requests ("LSRs") as of March 30, 2010 and for supplemental LSRs as of April 29, 2010. As of May 29, 2010, all functionalities within these interfaces were migrated to the XML Gateway machine-to-machine interface for electronic pre-ordering and ordering functions. Interested parties, including Competitive Local Exchange Carriers ("CLECs"), have been advised of this change through standard CLEC communications, including monthly Change Control Process ("CCP") meetings and the following Accessible Letter ("AL"): CLECSES10-031(dated March 19, 2010). The AL is available for review at the following web site: https://clec.att.com/clec/accletters/home.cfm?curMonth=yes

   Although these OSS changes do not substantively change the Service Quality Measurement Plan and SEEM Administrative Plan (collectively, "SQM/SEEM Plan"), the SQM/SEEM Plan documentation must be updated to accurately reflect the retirement of the EDI and TAG/Direct XML interfaces. Accordingly, AT&T has made minor, administrative updates to the SQM/SEEM Plan documentation. For the Commission's convenience, a red-lined version of the pages of the SQM/SEEM Plan which have been updated are included in this filing. The updated SQM/SEEM Plan will be available for review at the following website: http://pmap.wholesale.att.com/content/documentation.aspx. .It is important to note that from a performance measurement perspective, the migration to the XML Gateway interface will have *no impact* on the calculation of the OSS measures currently contained in the SQM/SEEM Plan. That is, AT&T will continue to report system response times provided to CLECs via the SQM measure known as OSS-1 [ARI]: OSS Response Interval, and will continue to report the

availability of access to the systems as part of the SQM measure known as OSS-2 [IA]: OSS Interface Availability. The method of calculation for the OSS-1 and OSS-2 metrics will not change and the results will continue to be reported on a monthly basis.

Sincerely,

Patrick W. Turner

PWT/nml

822354

BellSouth Service Quality Measurement Plan (SQM)

South Carolina Performance Metrics

Measurement Descriptions
Version 2.~~05~~06

Effective Date: ~~April 15~~May 29, 2010

Note: This version (2.~~05~~06) of the South Carolina SQM complies with the order issued by the South Carolina Public Service Commission (SCPSC) in Docket No. No. 2004-316-C on March 10, 2006. The reason for this version is to reflect the OSS architecture changes implemented on ~~April 15~~May 29, 2010.

Introduction

BellSouth Service Quality Measurement Plan (SQM) describes in detail the measurements produced to evaluate the quality of service delivered to BellSouth's wholesale customers. The SQM was developed to respond to the requirements of the Communications Act of 1996 Section 251 (96 Act) which required BellSouth to provide non-discriminatory access to Competitive Local Exchange Carriers (CLEC)[1]. The reports produced by the SQM provide regulators, CLECs and BellSouth the information necessary to monitor the delivery of non-discriminatory access.

This plan results from the many divergent forces evolving from the 96 Act. This specific SQM is based on Order No. 2006-136 in SCPSC Docket No. 2004-316-C dated March 10, 2006 and modifications resulting from the implementation of OSS architecture changes on April 19, 2008, July 18, 2009, November 14, 2009, and April 15, 2010, and May 29, 2010.

The SQM and the reports flowing from it must change to reflect the dynamic requirements of the industry. New measurements are added as new products, systems, and processes are developed and fielded. New products and services are added as the markets develop and the processes stabilize. The measurements will be changed to reflect the dynamic changes described above and to correct errors, respond to 3rd Party audits, Orders of the SCPSC, FCC and the appropriate Courts of Law.

This document is intended for use by someone with knowledge of the telecommunications industry, information technologies and a functional knowledge of the subject areas covered by BellSouth Performance Measurements and the reports that flow from them.

Report Publication Dates

Each month, preliminary SQM reports will be posted to BellSouth's PMAP website (http://pmap.bellsouth.com) by 8:00 AM EST on the 21st day of each month or the first business day after the 21st. The validated SQM reports will be posted by 8:00 AM on the last day of the month or the first business day after the last day of the month.

For details on SEEM, please refer to the SEEM Administrative Plan.

BellSouth shall retain the performance measurement Supporting Data Files (SDF) for a period of 18 months and further retain the monthly reports produced in PMAP for a period of three years. Instructions for replicating the reports in the SQM are contained in the Supporting Data User Manual (SDUM). The SDUM is available on the PMAP website and is automatically provided with each SDF download.

Report Delivery Methods

CLEC SQM and SEEM reports will be considered delivered when posted to the website. The State/Federal Commissions have been given access to the website.

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[1]*Alternative Local Exchange Companies (ALEC) and Competing Local Providers (CLP) are referred to as Competitive Local Exchange Carriers (CLEC) in this document.*

Section 2: Ordering

O-2 [AKC]: Acknowledgement Message Completeness

Definition

This measure provides the percent of transmissions/LSRs received via ordering interface gateways, which are acknowledged electronically.

Exclusions

- Manually Submitted LSRs
- Test Transactions/Records

Business Rules

Ordering interface gateways send Functional Acknowledgements for all transmissions/LSRs, which are electronically submitted by a CLEC. Users of ~~EDI~~ XML Gateway may package many LSRs from multiple states in one transmission. If more than one CLEC uses the same ordering center, an Acknowledgement Message will be returned to the "Aggregator", however, BellSouth will not be able to determine which specific CLEC this message represented.

Calculation

Acknowledgement Completeness = (a / b) X 100

- a = Total number of Functional Acknowledgements returned in the reporting period for transmissions/LSRs electronically submitted by ordering interface gateways, respectively
- b = Total number of electronically submitted transmissions/LSRs received in the reporting period by ordering interface gateways, respectively

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
   Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM/SEEM Analog/Benchmark
• Acknowledgments	Benchmark: 99.75%

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

CM-5 [ION]: Notification of CLEC Interface Outages

Definition

This report measures the time it takes BellSouth to notify the CLECs of an interface outage as defined by the Change Control Process (CCP) documentation.

Exclusions

None

Business Rules

BellSouth has 15 minutes to notify the CLECs via email, once the Help Desk has verified the existence of an outage. An outage is verified to exist when one or more of the following conditions occur:

1. BellSouth can duplicate a CLEC reported system error.
2. BellSouth finds an error message within the error log that identically matches a CLEC reported system outage.
3. When three or more CLECs report the identical type of outage.
4. BellSouth detects a problem due to the loss of functionality for users of a system.

The 15-minute interval begins once a CLEC reported outage or a BellSouth detected outage has lasted for 20 minutes and has been verified. If the outage is not verified within 20 minutes, the interval begins at the point of verification.

Calculation

Notification of CLEC Interface Outages = (a / b) X 100

- a = Number of interface outages where CLECs are notified within 15 minutes
- b = Total number of interface outages

Report Structure

- CLEC Aggregate
- Geographic Scope
    Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation **SQM Analog/Benchmark**

- By interface type for all interfaces accessed by CLECs ....97% <= 15 Minutes

Interface	Applicable to
EDI	CLEC
CSOTS	CLEC
LENS	CLEC
LEX	CLEC
Verigate	CLEC
XML Gateway	CLEC
TAG	CLEC
EBTA	CLEC
TAFI	CLEC/BellSouth

DS1

24 DS0s (1.544Mb/sec.)

DOE

Direct Order Entry System - An internal BellSouth service order entry system used by BellSouth service representatives to input service orders in BellSouth format.

DOM

Delivery Order Manager – Determines the needed processing steps for the service request. It then forwards the request on to each required system, in sequence, checking for errors and accuracy.

DSAP

DOE (Direct Order Entry) Support Application - A BellSouth system which assists a service representative or similar carrier agent in negotiating service provisioning commitments for non-designed services and Unbundled Network Elements.

DSL

Digital Subscriber Line – Allows customers to provide simltaneous two-way transmission of digital signals at speeds of 256 kbps via a two-wire local channel.

DUI

Database Update Information – A functional area measuring the timeliness and accuracy of database updates.

E

EBTA

Electronic Bonding Trouble Administration – A trouble administration system to perform maintenance and repair functions such as creating trouble tickets, performing mechanized loop tests, and retrieving trouble ticket status.

~~**EDI**~~

~~Electronic Data Interchange – The computer-to-computer exchange of inter and/or intra-company business documents in a public standard format.~~

Enhanced Verigate

An online Web-based system which provides CLECs electronic access to pre-order information.

ESSX

BellSouth Centrex Service – A central office housed communications system that provides the customer with direct inward and outward dialing, interconnection to all stations, and custom calling features.

F

Fatal Reject

LSRs electronically rejected from LASR because the required fields are not correctly populated.

Flow-Through

In the context of this document, LSRs submitted electronically via the CLEC mechanized ordering process that flow through to the BellSouth OSS without manual or human intervention.

FOC

Firm Order Confirmation - A notification returned to the CLEC confirming the LSR has been received and accepted, including the specified commitment date.

FX

Foreign Exchange – A network-provided service in which a telephone in a given local exchange area is connected, via a private line, to a central office in another exchange.

NC
No Circuits - All circuits busy announcement.

NMLI
Native Mode LAN Interconnection – An intraLATA, shared fiber-based, LAN inter-networking service.

NPA
Numbering Plan Area – Area Code portion of a telephone number.

NXX
The exchange portion of a telephone number. The first three digits in a local telephone number which identify the specific telephone company central office serving that number.

O

OBF
Ordering and Billing Forum Adapter-Provides gateway between ~~EDI~~XML Gateway/COBRA/Verigate and the various BIS systems to retreive pre-order data from legacy systems.

Ordering
The process and functions where resale services or unbundled network elements are ordered from BellSouth, as well as the process by which an LSR or ASR is placed with BellSouth

Ordering Interface Gateways
Gateways for CLECs to submit LSRs electronically

Order Types
The following order types are used in this document:

(1) T - The "to" portion of a change of address. This Order Type is used to connect main service at a new address when a customer moves from one address to another in any of the nine states within the BellSouth region. A "T" Order Type is always pared with an "F" Order Type which will have the same telephone number following the "F" Order Type Code unless the orders are within different central offices.

(2) N - Orders establishing a new account. Also, this Order Type Code is occasionally used when changing from one type of system to another, such as when changing from PBX to Centrex.

(3) C - Order Type used for the following conditions: changes or partial disconnections of service or equipment; change of telephone number, grade or class of main line, additional lines, auxiliary lines, PBX trunks and stations; addition of trunks or lines to existing accounts; move of equipment (other than change of address); temporary suspension and restoration of service at customer's request.

(4) R - Order Type used for the following conditions: additions, removals or changes in directory listings; responsibility change orders, addition, removal or changes in directory and billing information; other record corrections where no field work is involved.

OSPCM
Outside Plant Contract Management System – Provides scheduling and completion information on outside plant construction activities.

OSS
Operations Support System – Multiple support systems and databases which are used to mechanize the flow and performance of work. The term is used to refer to the overall system consisting of complex hardware, computer operating system(s), and applications which are used to provide the support functions.

SGG
ServiceGate Gateway – A common gateway to receive and send interconnection requests

SOCS
Service Order Control System – BellSouth system which routes service order images among BellSouth provisioning systems.

SOG
Service Order Generator - Designed to generate a service order for xDSL

SONGS
Service Order Negotiation and Generation System – This system supports the Consumer, Small Business and Public COUs by providing data entry screens and prompts to aid negotiation and entry of all order types.

Syntactically Incorrect Query
A query that cannot be fulfilled due to insufficient or incorrect input data from the end user. For example, a CLEC would like to query the legacy system for the following address: 1234 Main St. Entering "1234 Main St." will be considered syntactically correct because valid characters were used in the address field. However, entering "AB34 Main St." will be considered syntactically incorrect because invalid characters (example: alpha characters were entered in numeric slots) were used in the address field.

T

TAFI
Trouble Analysis Facilitation Interface - The BellSouth Operations System that supports trouble receipt center personnel in taking and handling customer trouble reports.

~~**TAG**~~
~~Telecommunications Access Gateway – TAG was designed to provide an electronic interface or machine-to-machine interface for the bi-directional flow of information between BellSouth's OSSs and participating CLECs.~~

Test Transactions/Records
Transactions created by BellSouth, or in tests originated by CLECs, where the CLEC has coordinated the test with BellSouth to enable identification of the transactions as part of a test used to test system functionality.

TN
Telephone Number

Total Manual Fallout
LSRs electronically submitted to BellSouth, which fallout, requiring manual input into a service order generator.

U V

UCL
Unbundled Copper Loop - A dedicated metallic transmission facility from BellSouth's Main Distribution Frame (MDF) to a customer's premises

UNE
Unbundled Network Element – Those parts of BellSouth's network required to be unbundled by the Telecommunications Act of 1996 and the implementing regulatory body

USOC
Universal Service Order Code – A set of alpha or numeric characters identifying a particular service or equipment

W

WFA
Work Force Administration – Electronic document tracking system for trouble reports

WFM
Work Force Manager – Mechanizes work performed by LSCs. Manages the workload of all paper/email requests for local service.

WMC
Work Management Center – Serves as a single point of contact (SPOC) for all requests for dispatch to the Field Work Group (Central Office or outside technicians)

WTN
Working Telephone Number

X Y Z

~~XML~~
~~eXtensible Markup Language – An international standards-based data formatting option designed for information exchange on network systems~~

XML Gateway
eXtensible Markup Language Gateway – A machine-to-machine electronic interface designed to provide bi-directional flow of information between AT&T's OSS and CLEC's OSS for pre-ordering and ordering functionality.

Appendix C: OSS InterfaceTables

OSS-1 [ARI]: OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)

Table 1: Legacy System Access Times For RNS

System	Contract	Data	Avg. Sec.	# of Calls
RSAG	RSAG-TN	Address	x	x
RSAG	RSAG-ADDR	Address	x	x
ATLAS	ATLAS-TN	TN	x	x
DSAP	DSAP-DDI	Schedule	x	x
CRIS	CRSACCTS	CSR	x	x
OASIS	OASISBIG	Feature/Service	x	x

Table 2: Legacy System Access Times For R0S

System	Contract	Data	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x
RSAG	RSAG-ADDR	Address	x	x
ATLAS	ATLAS-TN	TN	x	x
DSAP	DSAP-DDI	Schedule	x	x
CRIS	CRSOCSR	CSR	x	x
OASIS	OASISBIG	Feature/Service	x	x

Table 3: Legacy System Access Times For LENS/LEX/Enhanced Verigate (Pre-Order only)

System	Contract	Data	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x
RSAG	RSAG-ADDR	Address	x	x
ATLAS	ATLAS-TN	TN	x	x
DSAP	DSAP-DDI	Schedule	x	x
CRIS	CRSECSRL	CSR	x	x
COFFI	COFFI/USOC	Feature/Service	x	x
P/SIMS	PSIMS/ORB	Feature/Service	x	x

Table 4: Legacy System Access Times For ~~TAG/XML/~~XML Gateway

System	Contract	Data	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x
RSAG	RSAG-ADDR	Address	x	x
ATLAS	ATLAS-TN	TN	x	x
ATLAS	ATLAS-MLH	TN	x	x
ATLAS	ATLAS-DID	TN	x	x
DSAP	DSAP-DDI	Schedule	x	x
CRIS	CRSECSRL	CSR	x	x
P/SIMS	PSIM/ORB	Feature/Service	x	x

Table 5: Legacy System Access Times for M&R (TAFI)

System	BellSouth & CLEC	Count <= 10
CRIS	x	x
DLETH	x	x
DLR	x	x
LMOS	x	x
LMOSupd	x	x
LNP Gateway	x	x
MARCH	x	x
OSPCM	x	x
Predictor	x	x
SOCS	x	x
NIW	x	x

OSS-2 [IA]: OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair)

OSS Table 1: SQM Interface Availability for Pre-Ordering/Ordering

OSS Interface Availability Application	Applicable to	% Availability
EDI	CLEC	x
LENS	CLEC	x
LEX	CLEC	x
LASR	CLEC	x
WFM	CLEC	x
OBF	CLEC	x
Enhanced Verigate	CLEC	x
LESOG	CLEC	x
TAG/XML	CLEC	x
XML Gateway	CLEC	x
LNP Gateway	CLEC	x
COG	CLEC	x
SGG	CLEC	x
DOE	CLEC/BellSouth	x
SONGS	CLEC/BellSouth	x
ATLAS/COFFI	CLEC/BellSouth	x
BOCRIS/CRIS	CLEC/BellSouth	x
DSAP	CLEC/BellSouth	x
RSAG	CLEC/BellSouth	x
SOCS	CLEC/BellSouth	x
LFACS	CLEC/BellSouth	x
RNS	BellSouth	x
ROS	BellSouth	x

SOUTH CAROLINA SEEM ADMINISTRATIVE PLAN

South Carolina Plan
Version 2.~~05~~06

Effective Date: ~~November 14, 2009~~May 29, 2010

Note: This SEEM Administrative Plan version is issued to reflect the OSS architecture changes implemented on ~~November 14, 2009~~May 29, 2010.

B.2   Tier 2 Submetrics

Item No.	SQM Ref	Tier 2 Submetric
1	ARI	OSS-1 OSS Response Interval (Pre-Ordering/Ordering) – LENS/Enhanced Verigate
2	ARI	OSS-1 OSS Response Interval (Pre-Ordering/Ordering) – LEX
3	ARI	OSS-1 OSS Response Interval (Pre-Ordering/Ordering) – ~~TAG/XML/~~XML Gateway
4	ARI	OSS-1 OSS Response Interval (Maintenance & Repair)
5	IA	OSS-2 OSS Interface Availability – (Pre-Ordering/Ordering) – Regional per OSS Interface
6	IA	OSS-2 OSS Interface Availability – (Maintenance & Repair) – Regional per OSS Interface
7	LMT	PO-2 Loop Makeup – Response Time – Electronic – Loop
8	AKC	O-2 Acknowledgement Message Completeness – Acknowledgments
9	FT	O-3 Percent Flow-Through Service Requests – Business
10	FT	O-3 Percent Flow-Through Service Requests – LNP
11	FT	O-3 Percent Flow-Through Service Requests – Residence
12	FT	O-3 Percent Flow-Through Service Requests – UNE-L (includes UNE-L with LNP)
13	RI	O-8 Reject Interval – Fully Mechanized
14	RI	O-8 Reject Interval – Partially Mechanized
15	RI	O-8 Reject Interval – Non Mechanized
16	FOCT	O-9 Firm Order Confirmation Timeliness – Fully Mechanized
17	FOCT	O-9 Firm Order Confirmation Timeliness – Partially Mechanized
18	FOCT	O-9 Firm Order Confirmation Timeliness – Non Mechanized
19	FOCT	O-9 Firm Order Confirmation Timeliness – Local Interconnection Trunks
20	FOCC	O-11 FOC & Reject Response Completeness – Fully Mechanized
21	FOCC	O-11 FOC & Reject Response Completeness – Partially Mechanized
22	FOCC	O-11 FOC & Reject Response Completeness – Non Mechanized
23	OAAT	O-12 Average Answer Time – Ordering Centers – CLEC Local Carrier Service Center

6. Calculate the Total Affected Volume by multiplying the Volume Proportion from step 5 by the Total CLEC1 Volume.

7. Calculate the payment to CLEC1 by multiplying the result of step 6 by the appropriate dollar amount from the fee schedule. CLEC1 payment = Affected Volume$_{CLEC1}$ * $$ from Fee Schedule * multiplier. For the example that follows assume CLEC aggregate failure.

E.4.1   Example: CLEC-1 Reject Interval – Fully Mechanized

Submeasure Category = Ordering
Failure Month = Month 1
CLEC Aggregate Result = Failed

	n_c	Benchmark	Reject Interval	Volume Proportion	Affected Volume
State	600	97% <= 1 hour	95% <= 1 hour	.02	12

Payout for CLEC1 is (12 units) * ($20/unit) * (2.5 factor) = $600

E.5   Tier 2 Calculations For Benchmarks

Tier 2 calculations for benchmark measures are the same as the Tier 1 benchmark calculations, except they are based on the CLEC aggregate performance and the CLEC aggregate data will have failed for three (3) consecutive months.

E.6   Regional and State Coefficients

This section describes the method of calculating regional and state coefficients.

E.6.1   AKC

- Acknowledgement Completeness (AKC_~~EDI & AKC TAG~~XML Gateway)

Regional Coefficient Formula (Tier 1)

Coefficient = (A+B) / (C+D) where:

- A = number of valid FOC transactions of the CLEC in the state (fully & partially mechanized)
- B = number of valid RI transactions of the CLEC in the state (fully & partially mechanized)
- C = total valid FOC transactions of the CLEC in the region (fully & partially mechanized)

STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the

Legal Department for BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina

("AT&T") and that she has caused AT&T South Carolina's Updated SQM/SEEM Plans

in Docket No. 2001-209-C to be served upon the following on June 17, 2010:

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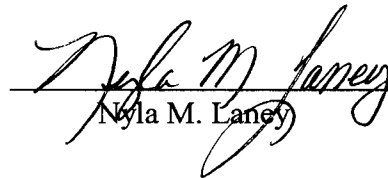(Sprint/United Telephone Company)
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